

Exhibit A

Van Benthysen, Brett

From: Darren Saunders <dsaunders@peroffsaunders.com>
Sent: Friday, March 25, 2022 3:26 PM
To: Caplan Brian D.
Cc: Van Benthysen, Brett
Subject: Re: Grant v. Trump

ALERT: This message originated outside of your network. BE CAUTIOUS before clicking any link or attachment.

I am informed that Mr. Trump is willing to testify at a deposition subject to a two-hour time limitation. Please advise whether you intend to take the deposition in person (in West Palm Beach) or remotely. Please let me know a few proposed dates on or after April 11 for the deposition.

Best regards,
Darren



Darren W. Saunders | Partner

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On Mar 24, 2022, at 8:41 PM, Caplan Brian D. <Bcaplan@reitlerlaw.com> wrote:

You were going to confirm to me that you would be producing Mr. Trump for deposition subject to reasonable conditions.

I do not want to seek an extension of time until that issue is buttoned down.

Then we can make the joint application early next week.

Best wishes, Brian

Brian D. Caplan
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From: Darren Saunders <dsaunders@peroffsaunders.com>
Sent: Thursday, March 24, 2022 6:31:41 PM
To: Caplan Brian D. <Bcaplan@reitlerlaw.com>
Subject: Re: Grant v. Trump

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Further to our call of yesterday, I suggest that we adjourn all of the dates for the depositions and submit a joint request to the Court for a two- month extension of the discovery deadline. This will allow us time to resolve any issues that may arise with respect to the deposition of President Trump ,a 30 (b)(6) witness for plaintiff Greenheart and any logistical issues that may need to be addressed. Please let me know if you agree.



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On Jan 26, 2022, at 9:00 AM, Caplan Brian D. <Bcaplan@reitlerlaw.com> wrote:

I can do 12:30.

Brian D. Caplan

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From: Darren Saunders <dsaunders@peroffsaunders.com>
Sent: Wednesday, January 26, 2022 8:59 AM
To: Caplan Brian D. <bcaplan@reitlerlaw.com>
Subject: Re: Grant v. Trump

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Sorry I need to push our call back to noon or after. Let me know what works for you. Thanks



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On Jan 25, 2022, at 8:27 AM, Caplan Brian D. <bcaplan@reitlerlaw.com> wrote:

Great.
Talk then.

Brian D. Caplan
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From: Darren Saunders <dsaunders@peroffsaunders.com>
Sent: Tuesday, January 25, 2022 8:27:01 AM
To: Caplan Brian D. <bcaplan@reitlerlaw.com>
Subject: Re: Grant v. Trump

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Ok. I will call you tomorrow at 10:00.



Darren W. Saunders | Partner

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On Jan 25, 2022, at 7:42 AM, Caplan Brian D. <bcaplan@reitlerlaw.com> wrote:

I am in an all day deposition today.
Can we talk tomorrow at 10:00 or 2:00?

Brian D. Caplan
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From: Darren Saunders <dsaunders@peroffsaunders.com>
Sent: Monday, January 24, 2022 11:43:36 AM
To: Caplan Brian D. <[Bcaplan@reitlerlaw.com](mailto:bcaplan@reitlerlaw.com)>
Subject: Re: Grant v. Trump

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Ok. I can speak tomorrow afternoon. Let me know a good time to reach you. Thank you.

Best regards,
Darren



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On Jan 21, 2022, at 4:45 PM, Caplan Brian D. <[Bcaplan@reitlerlaw.com](mailto:bcaplan@reitlerlaw.com)> wrote:

My clients have authorized me to make a settlement demand if you want to get on a call to discuss.

Best wishes, Brian

Brian D. Caplan
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